



Regional Mobile Infrastructure Inquiry

Consumer consultation exchange - synopsis of discussions

Introduction

The [Regional Mobile Infrastructure Inquiry](#) (the **Inquiry**) is examining the costs and drivers of access to towers and associated infrastructure in regional, rural, remote and peri-urban areas within Australia. It is also examining the feasibility of temporary mobile roaming during natural disasters and emergencies. It is intended to provide an evidence base to the Australian Government to support future policy decisions.

As part of the Inquiry, the ACCC held three stakeholder forums (referred to as 'consultation exchanges') with three groups of stakeholders. The stakeholder groups were industry, consumer, and emergency services related stakeholders.

This document provides a summary of the issues discussed and raised during the consumer consultation exchange. This exchange was held virtually on Wednesday 22 February 2023. Consumers and consumer groups who provided submissions to the Inquiry's initial consultation paper were invited to take part.

Five national peak consumer organisations, six regional development, community and local government organisations, and a number of individual consumers from across Australia responded and took part. ACCC Commissioner Anna Brakey chaired the consultation exchange.

In this summary individual participants are de-identified.

Coverage and congestion

Coverage was noted as sparse and intermittent in regional Australia. Attendees commented that many consumers are unable to access networks, due to mobile black spots, congestion, or lack of adequate infrastructure. Stakeholders raised concerns that congestion is increasing as the demand for data increases and the network is not able to meet demand.

One stakeholder highlighted that in regional and remote Australia where there is patchy coverage or areas of no coverage, being connected and staying connected is often the priority for consumers.

Stakeholders highlighted that in regional and remote Australia, there is usually only one provider and there often reliability issues. We heard accounts of consumers having two or even three phones in order to maximise their coverage with different mobile network options.

Stakeholders also highlighted that congested networks are an increasing issue. One stakeholder noted that congestion is due to a lack of investment and a lack of competition in that region. The stakeholder saw this as being due to there not being a risk to the mobile network operator for not providing a good quality service.

There was considerable discussion around congestion on mobile networks during tourist season. Stakeholders expressed frustration that there was no apparent planning from mobile network operators to compensate for regular tourist peaks.

One stakeholder stated that a 'use it or lose it' policy for spectrum licensing would improve congestion as it would result in more efficient spectrum allocation. The stakeholder noted that a lot of spectrum in rural and remote areas is underutilised.

Stakeholders discussed that there is a need for minimum mobile network quality standards to improve coverage and capacity issues.

'Connectivity is the issue – however competition would be nice.' (Attendee remark)

Competition

Stakeholders noted that often there is limited competition in regional, rural, and remote Australia for mobile phone services. The more remote a consumer is, the less likely they are to have a choice, as there is often only one mobile network operator available. A stakeholder also noted that mobile network virtual operators (MVNO's) often won't have the full network coverage of their associated mobile network operator, and so consumers have to go with a mobile network operator to maximise coverage.

Where a choice exists, stakeholders noted that consumers may be locked into staying with a provider due to the equipment carriers may encourage them to buy to enhance their coverage of connection, which will not work on a competitor's mobile network. Stakeholders notes that the purchase of boosters can further inhibit the ability for a consumer to change provider, due to not wanting to re-incur these costs with another provider.

Use of mobile boosters or amplifiers, as a way for consumers to extend coverage

Many stakeholders expressed frustration that boosters are being promoted to consumers as ways to expand mobile coverage, rather than there being investment to expand the mobile network coverage. Stakeholders noted this cost was being pushed onto consumers due to a market failure, as the market was not achieving the coverage expected from consumers.

Stakeholders highlighted that purchasing a mobile booster to amplify a mobile signal can be expensive. In some situations, even if a consumer purchased a booster, networks can become congested and this solution won't work. Stakeholders also highlighted that boosters are locked to one mobile network operator, and this further entrenches the need to stay with one mobile network operator.

'If people buy boosters, then they become more entrenched with their current operator.'

'Boosters are not independent as they can only work on that operator's network.'

Lack of consumer information and issues with coverage maps

Stakeholders discussed how consumers are unable to rely on publicly available coverage maps to provide them with accurate information about coverage. Coverage maps were discussed as being a vehicle for selling network coverage and not as a reliable source of information. Stakeholders felt that mobile network operators need to improve the quality of information they provide to consumers about coverage.

One stakeholder highlighted that despite public coverage maps suggesting their coverage, there are often 'grey' or 'shoulder' areas in the network where coverage is patchy. Another stakeholder noted that consumers are not always sure of the best plan for their needs, or what equipment different options may require. There was strong agreement that there could be clearer information and advice about this from mobile network operators.

A stakeholder raised that there should be greater comparability between mobile network operator's coverage, through for example a government published coverage map. This map could also show where towers that were supported by government funding are located.

Stakeholders also raised concerns about consumers being signed up to mobile phone contracts in areas where mobile network operators know that they can't consistently provide mobile services to the consumers.

'Coverage maps are seen as marketing tools. Need to include two key performance metrics: capacity and coverage.'

'Some consumers Coverage maps are seen as marketing tools. Need to include two key performance metrics: capacity and coverage.'

Planning for communications infrastructure in new housing areas

Stakeholders raised a lack of planning when building new housing districts or estates. One example was raised where around 3,000 - 4,000 houses had been built with another 8,000 planned, 2km outside of a major city. However, no mobile phone coverage was considered and there was very poor to no coverage in the area.

Another stakeholder added that linking in with local government is an important step, with some local governments finding that a mobile network operator will approach a local government at the end of a housing build process, and it is more difficult to access land at this point. Stakeholders emphasised that communities want input in terms of where mobile towers should go.

Satellite services

Satellite services were discussed as being a limited solution for many consumers. Stakeholders raised issues of extra cost, technical support, latency, and severe weather as reasons for consumers preferring a reliable mobile solution. Some stakeholders noted that satellite services are not able to provide ubiquitous coverage at a sufficient degree of quality for regional, rural, remote, and peri-urban Australia.

One stakeholder noted that satellite coverage in regional and remote Australia was not currently adequate for consumers wanting to use a data service. An example was given of some consumers finding it quicker to download a file to a USB drive, drive to a local computer hub, print out the file, and then drive home, than to email the file.

Stakeholders also noted that satellite services are expensive and there are many consumers who cannot afford this technology. Affordability was highlighted as the main issue with low-Earth orbit satellite solutions. Stakeholders noted that there are often drop-outs with satellite services, and that there is a lack of support which this technology from services providers, much more so than with other technologies.

We also heard that new low-Earth orbit satellite systems are not necessarily designed for Australian conditions, with reports that satellite terrestrial systems shut down in extreme heat. This can mean they are not effective in emergency situations. One stakeholder stated there was a need for

appropriate regulations and consumer protections if the technology becomes more common, such as minimum standards.

'Satellite is not adequate at the moment'

'There are affordability issues with satellite for many people. Satellite terminals are not necessarily designed for Australian conditions. Some people experience micro drops. No technology is 100% reliable so need back up.'

Digital literacy

Stakeholders discussed how people want to access the internet in a timely, cost-effective way but can be confused about their choices and how best to access it. Each consumer's situation in regional, rural, remote, and peri-urban Australia is unique.

Selecting a mobile plan and network that provides the best local and regional coverage, to knowing what support equipment to purchase (e.g. a booster) can be complex and mistakes are costly. Stakeholders discussed how advice provided by sales staff can be misguided and technical people sometimes recommend the purchase and installation of additional equipment that may be unnecessary or expensive. Individual digital literacy is often insufficient to deal with the complexity of topography, coverage maps, and data needs.

One stakeholder highlighted that a focus on literacy is key to enabling consumers to choose a plan that will best suit their needs. This could include educating consumers that there are other options to the mobile network, or other options to prepaid mobile phones.

Stakeholders highlighted the importance of involving communities, including remote Indigenous communities, in planning for communications infrastructure. By doing so the community receives information on the issues and benefits of the infrastructure, and they are upskilled in their connectivity literacy.

'Consumers need information to support getting the best communication options available. Consumers are not sure of the best plan, nor what equipment to get. Consumers need better access to independent advice.'

Government funding of towers

Stakeholders considered it is not financially feasible for the entire Australian land mass to achieve 100% mobile coverage using existing terrestrial technology. Stakeholders highlighted a desire to have greater input into the decision-making process of why and where government funding for mobile communications infrastructure is prioritised in regional Australia.

A stakeholder raised that there is a need for a national and consistent framework to address coverage issues, and encourages a consistent approach across all levels of government for assessing need. The criteria should be developed in conjunction with consumers.

A stakeholder discussed that where the market decides to build towers, vulnerable communities can miss out as they are less able to advocate for themselves and are not commercially attractive areas to expand coverage. One stakeholder stated that mobile phone towers should be nationalised in rural and remote areas, and leased back to mobile network operators, rather than being owned by private companies. Another stakeholder raised whether there is an opportunity for the government

to drive the national broadband network (NBN) as a government whole mobile telecommunications backhaul network.

One stakeholder noted that in their area, there have been several grants awarded in relation to mobile coverage. However, none of those grants eventuated and there were no approved plans to build towers. Despite the grants being awarded, this was not sufficient for a mobile network operator to build the tower in the area that needed it.

Stakeholders discussed 'needs-based' approaches to planning for communications infrastructure. There are many benefits from connectivity, such as the ability to access telehealth, which should be considered when prioritising funding for new infrastructure. A stakeholder also raised that mobile communications are an essential service, which the government should take responsibility for.

Many stakeholders raised concerns around government funded towers being in private ownership, and this tower ownership now transferring to superannuation companies seeking profits on their investment.

'Need a national and consistent framework to address coverage issues. The funding well has run dry. The market has been deciding where to build towers and vulnerable communities have missed out as they are less able to advocate for themselves.' 'There is a need for a policy framework for regional telecommunications that encourages a consistent framework across all levels of government.'

Use of mobile phones in remote Indigenous communities

Some stakeholders raised that mobile phone uptake in some Indigenous communities is high because mobile services are more accessible and affordable than other communications services. There may be no fixed line connection to consumer houses in these communities. Prepaid plans can be popular as they appear to be cheaper if a consumer has a low or unreliable income. It can also be easier to get a prepaid top up than to get an ongoing mobile phone plan. Stakeholders also noted that there are no prepaid NBN options as an alternative. There can also be a higher availability of mobile phones in remote stores (as opposed to laptops etc.).

People in remote Indigenous communities can be highly mobile and travel regularly. Mobile phones can be preferred due to their mobility, and mobiles can also be exchanged and shared between family members. Despite the propensity by people for mobile phones, limited mobile coverage exists in many parts of very remote Australia (due to low population density).

The upfront cost of devices can also be a significant barrier to accessing alternatives, such as terminals that may be required for satellite connections, or an NBN router.

Stakeholders also highlighted the unreliability of landline phones, sharing examples of landline phones being down for months at a time. Stakeholders shared stories of a lack of maintenance of existing telecommunications infrastructure in remote communities. For example, forgetting to put in back-up generators when communities were told this would be done, or not mowing the lawn around infrastructure for four years, ultimately resulting in a fire.

Stakeholders noted that councils for remote communities are often stretched thin. These councils may not have the capacity or knowledge to fully engage with the communities needing place-based communications solutions.

There was discussion around different types of communications infrastructure that could be utilised in remote communities, such as Wi-Fi mesh, satellite and using Wi-Fi calling. There was also discussion about a lack of awareness in some communities about the providers of these alternative services, and how to obtain a service from these providers.

Stakeholders agreed that digital ability and affordability were major issues for remote communities. Stakeholders also highlighted the importance of being connected to the Internet, to access banking, health and government services. An inability to access such services contributes to poor end of life outcomes.

There is a general agreement between stakeholders that place-based digital solutions need to be designed in conjunction with communities as coverage is rolled out. Challenges facing remote communities and their residents are complex. In addition to being connected to the digital world, people, require assistance with digital literacy. Stakeholders highlight improved digital access, digital affordability and digital literacy are crucial for the delivery of government and other services to remote Indigenous communities.

One stakeholder provided an example of how the lack of mobile connectivity impacted the ability of Indigenous communities to access services on their mobile phones:

- *If you don't have a connection you cannot get a (NDIS) carer to sign off on services*
- *If you don't sign within a certain time, you get cut off from these services*
- *Government services on legacy software can be difficult to access via mobile phone*

Concerns about 3G switch off

Many stakeholders raised concerns about consumers relying on 3G services, and there not being clarity around what happens when the 3G networks are shut down. Stakeholders queried why there appeared to be a reluctance to consider upgrading straight to 5G in regional and remote areas.

Mobiles and emergencies/natural disasters, temporary mobile roaming

Stakeholders expressed support for temporary mobile roaming during times of emergencies and natural disasters. Stakeholders highlighted that power failure is often the main reason for the mobile networks failing during floods and bushfires. Most of the time this power failure is due to a local power outage, rather than direct damage to the mobile tower.

Stakeholders noted that temporary mobile roaming would not help people living in rural or regional areas where there is no mobile coverage. There was agreement amongst attendees that regional and rural communities need a range of options including radio, landline, and satellite options in an emergency in case one or more options are unavailable. They also noted the importance of building network resilience such as site hardening for critical infrastructure. A stakeholder noted that the government should mandate minimum power standards for back-up generators on all mobile towers.

Some stakeholders noted that they were advocates for both domestic roaming and temporary mobile roaming during natural disasters.

Stakeholders raised concerns about temporary mobile roaming adding to congestion. One stakeholder raised that congestion issues should be prioritised before considering temporary mobile roaming, as temporary mobile roaming will make the congestion issue worse.

Many stakeholders highlighted the importance of mobile phones during natural disasters. Stakeholders shared experiences of their areas being impacted by fires, failing landline infrastructure and not being able to connect to the mobile network or to NBN satellite services. There was an agreement that people need to be able to text loved ones or emergency services that they are safe or not. Some stakeholders agreed that being able to send a text message was sufficient given issues of congesting the mobile network. However other stakeholders raised issues

of text messages getting 'stuck' and not necessarily transmitting for hours after, and due to this voice connection would be preferred.

There was discussion about how not every emergency needs a 000 call, and that temporary mobile roaming could alleviate unnecessary calls to emergency services.